

Appendix B  
Georgetown Lake Hazardous Fuels Reduction - Response to EA Comments

Letter	Comment	Category	Comment Text	Response Text
1	1	Process	"The lack of various alternative actions considered indicates the Forest Service (FS) believes that few if any impacts will result to wildlife as a result of this fuels reduction program. Otherwise, if there are impacts to wildlife, the range of treatments being proposed should address low and higher impacts to wildlife habitat. It does not look like the FS has taken a hard look at how fuels reduction projects reduce wildlife habitat."	As disclosed on EA page 8, the ID team determined there were no public concerns requiring the development of additional alternatives. The project has been shaped based in part on public comments. A suite of mitigation measures as disclosed in EA Appendix A help ensure minimal impacts to resources while still accomplishing the purpose and need for the project: to reduce fuels. EA pages 13-15 summarize the detailed analysis of potential effects to terrestrial wildlife contained in the wildlife report in the project file. The wildlife biologist has determined there will be minimal impacts to wildlife habitat.
1	2	Process	"There is no apparent concept of cumulative impacts in the draft EA in regards to wildlife. There is no information provided on current habitat conditions for the most vulnerable species of wildlife, such as those associated with older, undisturbed forest habitat, snags, and downed logs, or as well, ecotone habitat. If such habitat has already been significantly impacted in this landscape, then it will be important to address remaining habitat. However, it is unclear how the needs of the more vulnerable wildlife species were considered in this project."	As disclosed on EA page 10, no negative cumulative effects to resources are anticipated. EA pages 13-15 summarize the detailed analysis of potential effects to terrestrial wildlife disclosed in the wildlife report in the project file. The wildlife report contains detailed information on current habitat conditions; Table 7 on EA page 14 summarizes the potential impacts and the Biological Evaluation determinations for sensitive species.  A listing of past, present, and reasonably foreseeable future activities can be found in the project file. Activities on private land including future subdivisions and fuels treatment were considered. The project file also contains maps of past treatment activities.
1	3	Process	"It seems that a lot of the proposed units have questionable value to protect structures. If the FS has to include more logging in order to pay for the fuels reduction parts of this project, then the effectiveness of the latter should be a top priority for planning. If there is little direct value to protect structures from a particular fuels unit that will be expensive to implement, then maybe the unit should be dropped."	As disclosed on EA page 6 and displayed in Table 4, all treatment units were designed to protect Values at Risk. Units are located either surrounding or immediately adjacent to those values. Not all values at risk are structures, some are ingress/egress routes which will ensure safer evacuation routes.  The project is not designed to include logging of larger trees as a method to make the project more economically viable.
1	4	Process	"The commercial thinning of forest stands, including trees up to a 14" dbh, will have detrimental impacts to numerous wildlife species, including those associated with snags and downed logs. If there are no significant fire protection effects of these logging units on private structures, and the units are simply being done to pay for the rest of the project, this should be noted."	EA pages 13-15 summarize the detailed analysis of potential effects to terrestrial wildlife contained in the wildlife report in the project file. The wildlife biologist has determined there will be minimal impacts to wildlife habitat.  Refer to previous response. Those relatively few acres in which commercial logging of up to 14" trees is prescribed are those acres near infrastructure where crown density of large trees contributes to unacceptable risk of crown fire. In order to ameliorate that threat, some trees up to 14" will be cut to reduce the crown density and connectivity. Refer to Table 3 on EA page 5; the treatment description for the comprehensive treatment discloses the primary emphasis would be on removing trees less than 6.5"; additional trees would be removed up to 14" only to the extent necessary to reduce Crowning and Torching Indices.
1	5	Process	"There is no information in the draft EA about the requirements of the private sector for protecting their property from fire. If this is not required of the private homes in the area, then your project is relatively useless."	Requiring the private sector to protect their property from fire is outside the jurisdiction of the Forest Service, however the agency is fully committed to implementing cross-boundary fuels treatments on National forest System lands that complement the actions private property owners need to take to protect their own property from wildfire.  The Georgetown Lake Hazardous Fuels Reduction Program, Final Report submitted by Headwaters RC&D Area, INC (see project file) shows that some progress has been made in risk reduction around many homes and other structures on private property.  The Forest Service treatment locations are designed to reduce risk for people and infrastructure in very specific locations and generally are designed to provide a complementary effect to those treatments that have

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				already been completed, will be completed, or should be completed on private property in the future. See Table 4 on EA pages 6-7.
1	6	Fuels	"The amount of fuels reduction required to protect private structures (homes) is actually quite small, or only several hundred feet next to homes. We have attached a recent synopsis on this topic by Jack Cohen that was published in High Country News that supports our view on protection of private structures. If the Cohen strategy was used in the project, many of the units would not be necessary."	<p>If the purpose and need of the project is to only reduce structural ignition, then the first sentence of this comment would be true, in part. However the purpose and need of the project is to reduce fuel loads and break up fuel continuity <i>in order to increase the ability of firefighters to actively and effectively suppress fires within the project area as well as increase firefighter's ability to actively suppress human-caused fires that may start inside the project area.</i> The reduction of structural ignition, as defined by Cohen, is not the main purpose and need of this project because most structures within the project area occur on private land and the Forest Service has no legal jurisdiction over the actions of private land owners. However, because of the location of structures either on FS land, very near to FS land, and/or immediately adjacent to the FS boundary, some of the units in the Georgetown Lake project do actually treat the home ignition zone as defined by Cohen (2000).</p> <p>As disclosed on EA page 6 and displayed in Table 4, all treatment units were designed to protect values at risk. Units are located around or adjacent those values. For example:</p> <ul style="list-style-type: none"> <li>-Units 1 and 2 include homes on federal ground under long-term special use permits. Their total unit width is less than 300 feet.</li> <li>-Unit 3 is approximately 500 feet wide and immediately adjacent to homes and outbuildings on private land.</li> <li>-Units 4 and 5 are less than 300 feet wide and located along the private/federal boundary</li> </ul> <p>This pattern is repeated in nearly every unit.</p>
1	7	Process	"The FS should display the areas of past harvest within your project area."	A listing of past, present, and reasonably foreseeable future activities can be found in the project file. Activities on private land including future subdivisions and fuels treatment were considered. The project file also contains maps of past treatment activities.
1	8	Process	"The FS should display the old growth management strategy in this project area."	Refer to EA page 7; the project does not include any treatment in old growth. The project would have no impact on existing old growth as no treatments are proposed in old growth stands (see Silvicultural Report).
1	9	Vegetation	"What is the expected long-term impact on snag habitat and downed logs in the proposed logging units?"	<p>There are no logging units in the project, there are fuels reduction units, some of which will be implemented using a timber sale contract and logs created as a by-product of the treatment.</p> <p>The wildlife report provides an in-depth analysis of snag habitat for associated species. Updated monitoring data for the analysis area and Forest show that snag densities exceed Forest Plan standards, with snag habitat increasing exponentially because of insect infestations and wildfires that have occurred on the Forest (and across the Region) over the past several years (refer to Black-backed woodpecker section in the wildlife report). EA Appendix A includes mitigation that all snags greater than 10" DBH will not be cut except as necessary to maintain safety of treatment crews, operators, or the public.</p>

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1	10	Vegetation	“Recent ideas on forest thinning include one where forest thinning and simplification of lodgepole pine stands sets up these stands for a future severe infestation, and high mortality rate, from bark beetles. Since only large trees will remain in the stand, and large trees are the most vulnerable to bark beetles, there will be no surviving trees once an infestation has passed. So is your proposed management strategy rationale” [sic]?	<p>It is unclear as to where the “recent ideas” referred to in this comment originate.</p> <p>In any case, the prescribed treatments are based on scientific literature, FS expertise and experience, and are designed to achieve a mix of ages and size classes while sufficiently reducing the fuel profile for the treatment units. As stated in the Silviculture report, the goal is for thrifty stands with sufficient density to resist blowdown while keeping tree crowns sufficiently widely spaced to resist crown fire. Thinning the stands to reduce crown density will also increase the vigor of the remaining trees and likely decrease the amount of tree mortality from disturbance such as insects since inter-tree competitive stress will decline for the residual stand. Micro-sites will be less attractive for bark beetles in thinned stands since pheromone clouds will be less likely to hang next to individual trees, making bark beetles less effective in targeting individual trees for attack. However the primary purpose and need of the project is to reduce fuels, not necessarily increased resistance to bark beetle attack.</p>
1	11	Wildlife	“The proposed slashing and burning of big game winter range is supposedly a benefit to these species. However, there was no information provided on what species will be burned, and what plant species will increase and thus be available to big game species in the winter. Also, what information is available to demonstrate that big game winter forage is currently limiting. This is an important consideration, because if big game is not benefited from the slashing and burning, the severe costs of such Nongame species will not be balanced out by benefits to big game species. And if this occurs, the Forest Plan management direction (C2) for big game winter range will be violated.”	<p>As disclosed on EA pages 2-3, the purpose of this project is to reduce hazardous fuels; however, one of the “outcomes” or benefits associated with slashing and burning would be improved forage condition. Opening of the stands and removing conifers from grass areas may improve forage quality and to some degree quantity (the project is too small in scale to provide measurable improvements). MA C2 permits harvesting of logs and other forest products, as well as prescribed burning, when these treatments are compatible with winter range thermal cover needs (1987 Deerlodge FP, p.III-28 through III-29); refer to Table 5 on EA page 9-10.</p> <p>Nothing in the management standards prohibit understory thinning and prescribed burning to reduce hazardous fuels and increase firefighter and public safety.</p>
1	12	Vegetation	“Simply stating that the conifers on an area will be slashed, and the area subsequently burned provides little information to the public. What species of trees will be cut, and then what species of grasses, shrubs and forbs will be burned? What will the resulting vegetation look like after slashing and burning?”	The EA on page 4 discloses fuels reduction would occur in lodgepole pine and Douglas-fir. The silviculture, wildlife, and sensitive plant reports include descriptions of the treatment units, which are typical for the landscape in this part of the BDNF. Refer to Table 3 and Table 5 on EA pages 6 and 10 for summarized descriptions of treatment descriptions.
1	13	Wildlife	“What type of monitoring is available to demonstrate wildlife impacts of the proposed slashing and burning, as well as just the slashing treatments?”	The wildlife report provides all background information and includes analysis of overall population status, distribution, and local occurrence records for wildlife species; and an analysis of the direct, indirect, and cumulative effects, all of which are well supported by the literature. All inventory and monitoring information for wildlife are referenced in the wildlife report.
1	14	Wildlife	“There are several species at risk that are associated with open, woodland ecotones. We did not see any analysis of such in the draft EA.”	Project impacts and BE determinations for sensitive species are summarized in Table 7 on EA pages 14-15, and fully analyzed in the wildlife report. The wildlife biologist has determined there will be minimal impacts to wildlife habitat.
1	15	Vegetation	“How will the loss of current and future snags and downed logs be “mitigated” by this project? For example, will additional snags be provided in adjacent areas?”	EA Appendix A includes mitigation that all snags greater than 10” DBH will not be cut except as necessary to maintain safety of treatment crews, operators, or the public. Also, please refer to Comment #9 response.
1	16	Roads	“We couldn’t tell exactly where the new temporary roads will be located. Will the temporary roads be completely obliterated, or simply kept in cold storage for additional fuels reduction treatments?”	Perhaps we weren’t as clear in the EA as we could have been. There are no temporary roads associated with this project. The 300 feet of temporary road referred to on EA page 1 was approved in the 2006 Decision Memo. The road section was constructed in Unit 3a; that unit was completed under the approved DM and the road has already been obliterated.

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2	1	Process	"These projects sound good to me, especially considering the precautions the Forest Service appears to be taking to protect wildlife, fisheries and plant community values. You have my approval."	The Forest Service acknowledges your support for the project. We have designed the project to include a suite of mitigation measures (EA Appendix A) to help ensure minimal impacts to resources while accomplishing the purpose and need.
3	1	Process	"As before, I have found BDNF's proposal very well thought out and well done. The graphics are outstanding, very clear and professional. Please undertake this hazardous fuels reduction as proposed. I hope the logging company(s) selected to do this work will adequately clean up their mess when finished."	The Forest Service acknowledges your support for the project. Yes, the logging company will be required to "clean up" per contract specifications.
4	1	Process	"I feel the work should continue. If these dead and dying trees are left standing it could be catastrophic for many property owners at Georgetown Lake and the surrounding area. If a fire did happen it would be a tremendous cost to the tax payers to control such a fire, and the smoke that goes along with these fires is very hard on the health of everyone in the area."	<p>The Forest Service acknowledges your support for the project. The EA summarizes the effects of the no action alternative (with detailed analysis contained in the project file).</p> <p>The agency encourages private property owners to complete fuels reduction and structure ignition mitigation measures such as those outlined in the Firewise program on their private property as soon as possible to complement the treatments proposed in this EA.</p>
4	2	Process	<p>"Our logging business was working on this project when we were shut down. Many people around the lake came up to our job site and thanked us for the fuel reductions and for doing such a good job. The only ones against this project are the extreme environmentalists who want to see the timber industry go down in Montana. It is scary that a small environmental group with their lawyers can be this powerful to shut down a government timber sale. I am glad most people realize the need to remove the hazardous fuels in this area, and I hope they are writing in to let you know.</p> <p>I hope what ever the problem is it will get corrected and we can continue our work at the Georgetown Lake Project."</p>	As disclosed in the EA (page 1), recent court rulings invalidated the use of the CE category under which the 2006 decision was analyzed and documented. We developed the EA and are proceeding through the NEPA process to issue a decision on the remainder of the project.
5	1	Process	<p>"Granite County approves this project to reduce hazardous fuels and subsequently the loss to private inholdings and infrastructure from wildland fire in the Georgetown Lake Wildland Urban Interface (WUI). This area has been previously identified as a WUI in both the [sic] Granite County and Anaconda-Deer Lodge County in their Community Wildfire Protection Plans.</p> <p>This project will reduce the potential of damage to public and private values at risk within the project area. In addition, the difficulty of suppressing intensely burning wildfires poses additional threats to public and firefighter safety. The project will reduce risk, both to property and human safety.</p> <p>The Georgetown Lake area continues to be a popular place for recreation, and has seen an increase in both new subdivisions and building out of older subdivisions, only increasing public safety concerns. In addition, the mortality on the forest due to beetle infestation is apparently increasing, further indication for fuel reduction activity."</p>	<p>The Forest Service acknowledges your support for the project and your recognition of the purpose and need for reducing hazardous fuels in the project area.</p> <p>The agency encourages private property owners to complete fuels reduction and structure ignition mitigation measures such as those outlined in the Firewise program on their private property as soon as possible to complement the treatments proposed in this EA.</p>
5	2	Process	"The project in 2002 started at 1,100 acres, and has steadily diminished. We support a much larger project than this 2009 proposal, but since that doesn't seem to be happening, we support any fuel reduction in this area. Specifically, we support and encourage a decision to implement Alternative 2."	The Forest Service acknowledges your support for the project. As summarized on EA page 1, various iterations of this project have been proposed. The 2006 decision and the proposed actions analyzed in the EA focused on the values at risk as summarized in Table 4.

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6	1	Process	<p>"After reviewing the Environmental Assessment for the Georgetown Lake Hazardous Fuels Reduction project, I believe this project should continue to move forward. Everything has been well considered in the EA.</p> <p>Our company, Kanduch Logging, INC. was working the fuel reductions project for Sun Mountain Lumber last year when the sale was revoked. This project is a good thing for fuel reduction, getting rid of bug kill, and thinning – it is healthy for our forests and wildlife, provides fire safety for home owners in the area, and also creates jobs. Many people in the area came up to our site and thanked us for doing the fuels reductions and for doing a good job. Yes, the Georgetown Lake Hazardous Fuels Reduction project should move forward."</p>	The Forest Service acknowledges your support for the project and your recognition of the purpose and need for reducing hazardous fuels in the project area. The EA summarizes the effects of the no action alternative (with detailed analysis contained in the project file).
7	1	Process	<p>"After reviewing the Environmental Assessment (EA) for the Georgetown Lake Hazardous Fuels Reduction project, I believe this project should continue to move forward. Everything seems to have been well considered in the EA.</p> <p>The Georgetown Lake area does have intermittent bug killed dead trees along with closely grown small diameter trees. The bug kill needs to be logged and the area thinned to reduce fuel and risk for wild land fires in the area as well as for protection of the homes, cabins, and recreational sites in the Georgetown Lake area.</p> <p>As our company, Kanduch Logging INC., did some of the logging in this project last year for Sun Mountain Lumber, we know first hand that this type of project can be done safely and with low impact to the environmental eco-system. The harvested areas look good, and a lot healthier and safer. Yes, the Georgetown Lake Hazardous Fuels Reduction project should move forward."</p>	The Forest Service acknowledges your support for the project and your recognition of the purpose and need for reducing hazardous fuels in the project area. The EA summarizes the effects of the no action alternative (with detailed analysis contained in the project file).
8	1	Process	<p>"I believe this is a good project and should be continued. Removing the bug infested trees and the potential trees for the beetles will help eliminate fire danger as well as create a healthier forest. Since Georgetown Lake is so populated, a fire in that area would be a catastrophe."</p>	The Forest Service acknowledges your support for the project and your recognition of the purpose and need for reducing hazardous fuels in the project area.